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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

UNITED STATES OF AMERICA	Case No. 2:12-CR-00645
vs.	DEFENDANTS' JOINT PROPOSED VOIR DIRE
ROBERT G. LUSTYIK, JR., MICHAEL L. TAYLOR, and JOHANNES W. THALER	

Defendants Robert Lustyik and Johannes Thaler, by and through their undersigned counsel, hereby move to conduct Voir Dire pursuant to the defendants' VI Amendment rights to an impartial jury.

The Defendants requests that Voir Dire include the following questions, although the Defense is amicable to reasonable proposals and forms of administration:

QUESTIONS TO BE ANSWERED ALOUD

1. Name and city or area where you live (do not give specific address).
2. Educational background.
3. Occupation for the last 5 years. If retired, please state former occupation or, if self-employed, please so indicate.
4. What are your job responsibilities?
5. What is the occupation of your spouse, deceased or former spouse(s), or longtime partner or companion?
6. If you have any children, please state how many and the age of each.
7. Have you, a close friend, or a close family member ever been in law enforcement? IF yes, please describe the nature of employment.
8. Have you ever served in the United States military and if yes how many years did you serve and what rank did you achieve?
9. Please tell us your hobbies or interests.
10. Please tell us the newspapers, magazines or other media you regularly read.
11. If you or a family member have bumper stickers on a vehicle, please tell us what they say

QUESTIONS TO BE ANSWERED IN WRITING

1. Do you know any of the parties in this case, me [the Judge], or any of the lawyers who have just been introduced to you?
2. Do you know any of the witnesses that have just been named?
3. Are you acquainted with any other potential juror here today?

4. Have you ever served as a juror in a civil or criminal case?
5. Other than a divorce proceeding, have you ever testified in a trial or ever given a deposition?
6. Have you or any of your immediate family members been represented by the lawyers present here today, or does anyone you know work with them in the United States Attorney's Office?
7. Are you, have you been, or are any immediate family members or close personal friends employed by the federal government or the United States Attorney's Office?
8. As you have heard, some representatives of law enforcement agencies are scheduled to testify in this case. It is important that you as jurors not give them any more, or less, credibility than any other witness in this case. Would any of you, either because of your relationship to someone in law enforcement, or for any other reason, find yourself giving a law enforcement witness either more or less credibility than any other witness, or prejudice in any way, in this case?
9. Would you give someone in law enforcement greater or lesser weight or credibility over that of the Defendant or their witnesses?
10. Have you or any of your family members had specialized training, education, or experience in law?
11. As a juror, your own views about whether a particular law or rule of evidence is right or wrong cannot play a part in your deliberations and review of the evidence. Would you be unable to follow my instructions about these rules of law, as well as all other instructions, that will be given to you at the end of the case?

12. This trial is expected to last 4 weeks. Do you have any reason why you could not serve on this jury for that length of time?

13. Do you know of any other reason why you could not serve on this jury if selected?

14. Have any of you ever been involved as a victim, or has a close friend or family member ever been a victim of a crime identical or similar to the one of which the defendant has been accused?

15. Have any of you, any member of your immediate family, or a close personal friend ever been involved, in any court or before a grand jury, in a civil or criminal matter, either as a defendant, a witness, or a victim?

16. Do you have any special disability or problem that would make serving as a member of this jury difficult or impossible?

17. Is there anything about the specific crimes charged in this case that would make it impossible for you to serve as a juror in this case and render an impartial, honest verdict?

18. Is there any reason why you could not give the Defendant or the United States a fair trial?

19. Is there any other reason you know of that would affect your ability to sit on this jury and render a fair and impartial verdict for either the United States or the Defendant?

Respectfully Submitted by counsel for Defendant
Johannes Thaler

/s/ Daniel Calabro

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Robert Lustyik, Jr.

/s/ Raymond Mansolillo

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CERTIFICATION

I hereby certify on September 26, 2014, I filed a true and accurate copy of the attached
Proposed Jury Voir Dire via ECF.

/s/ Daniel Calabro